

EXHIBIT “B”



MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.

Attorneys-at-Law

U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

www.mdbbe.com

PAUL R. ROBINSON
ATTORNEY-AT-LAW

DIRECT DIAL: (412) 553-7146
E-MAIL: probinson@mdbbe.com

February 21, 2006

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
2815 Wilmington Road
New Castle, PA 16105

Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

Dear Mr. Hartman:

I am in receipt of plaintiff's expert report and curriculum vitae of Ralph Lipsey Barnett and am requesting the following information related to this report:

1. video tape of the human factors investigation of accidental foot switch activation noted under roman numeral 6 (page 7) of the report;
2. listing of the five (5) males and five (5) females names and addresses who took part in this investigation;
3. a complete copy of both Ralph Lipsey Barnett and Matthew J. Ulmenstine's files.

Additionally, although you have provided a curriculum vitae for Ralph Barnett, you have not provided a rate schedule or a listing of cases in which Mr. Barnett has testified as required by the Federal Rules of Civil Procedure. Please provide this information upon your receipt of this letter.

Thank you.

Very truly yours,



PAUL R. ROBINSON

PRR/hmt

Dallas W. Hartman, Esquire
February 21, 2006
ALFA-107530
Page 2

bcc: John A. Culver, Esquire
bcc: Ms. Julie DeCraene
Claim No: YEB 12380 L
bcc: Ms. Katie Heim
bcc: Mr. Robert Walsh



MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.

Attorneys-at-Law

U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

www.mdbbe.com

MATTHEW C. ASHBY
PARALEGAL

DIRECT DIAL: (412) 553-7048
E-MAIL: mashby@mdbbe.com

February 24, 2006

VIA FACSIMILE (724) 652-8380

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
2815 Wilmington Road
New Castle, PA 16105

Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

Dear Mr. Hartman:

Please allow this correspondence to serve as a request for dates of availability of Ralph L. Barnett for a discovery deposition in the above-captioned matter to take place in our offices. Attorney Paul Robinson of our office is available on the following dates:

March 16, 17, 20, 23, 24, 2006

Please contact our office at your earliest convenience to advise dates on which you and Mr. Barnett are available.

We look forward to hearing from you. Thank you.

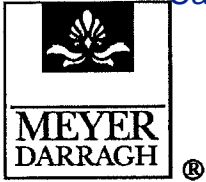
Very truly yours,

MATTHEW C. ASHBY
Paralegal to PAUL R. ROBINSON, ESQUIRE

MCA/hmt

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
February 24, 2006
ALFA-107530
Page 2

bcc: John A. Culver, Esquire
bcc: Ms. Julie DeCraene
Claim No: YEB 12380 L
bcc: Ms. Katie Heim
bcc: Mr. Robert Walsh
bcc: Paul R. Robinson, Esquire



MEYER ♦ DARRAGH

BUCKLER BEBENEK & ECK, P.L.L.C.

U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219

Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

www.mdbbe.com

Fax Transmission

| | | | |
|----------|-------------------------|---------------|---------------------------|
| To: | Dallas W. Hartman, P.C. | From: | Matthew C. Ashby, Esquire |
| Company: | Dallas W. Hartman P.C. | Date: | February 24, 2006 |
| Fax #: | 724-652-8380 | Timekeeper #: | 0047 |

You should receive 2 Page(s) including this cover page.
If you do not receive all pages, please call 412-261-6600 at Ext. 7023 (CopyCenter)

Message:

Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

The information contained in this facsimile message is attorney privileged and confidential information intended only for the use of the individual or entity identified named above. If the reader is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via the U.S. Postal Service. We shall remit postage for the return of any such communications. Thank you.

MDBB&E MATTER #: 107530

RECEIVER'S TELEPHONE #:

* * * Transmission Result Report (MemoryTX) (Feb. 24. 2006 11:43AM) * * *

13
23

Date/Time: Feb. 24. 2006 11:41AM

| File No. Mode | Destination | Pg (s) | Result | Page Not Sent |
|------------------|-----------------|--------|--------|------------------|
| 0156 Memory TX | #41417246528380 | P. 2 | OK | |

Reason for error

E. 1) Hang up or line fail
E. 3) No answer

E. 2) Busy

E. 4) No facsimile connection



www.mdbbc.com

MEYER ♦ DARRAGH**BUCKLER BEBENEK & ECK, P.L.L.C.**U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754**Fax Transmission**

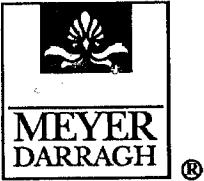
| | |
|---------------------------------|---------------------------------|
| To: Dallas W. Hartman, P.C. | From: Matthew C. Ashby, Esquire |
| Company: Dallas W. Hartman P.C. | Date: February 24, 2006 |
| Fax #: 724-652-8380 | Timekeeper #: 0047 |

You should receive 2 Page(s) including this cover page.
If you do not receive all pages, please call 412-261-6600 at Ext. 7023 (CopyCenter)**Message:**Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

The information contained in this facsimile message is attorney privileged and confidential information intended only for the use of the individual or entity identified named above. If the reader is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via the U.S. Postal Service. We shall remit postage for the return of any such communications. Thank you.

MDBBE MATTER #: 107530**RECEIVER'S TELEPHONE #:**

P0742654.1



MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.

Attorneys-at-Law

U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

www.mdbbe.com

MATTHEW C. ASHBY
PARALEGAL

DIRECT DIAL: (412) 553-7048
E-MAIL: mashby@mdbbe.com

March 3, 2006

VIA FACSIMILE (724) 652-8380
Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
2815 Wilmington Road
New Castle, PA 16105

Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

Dear Mr. Hartman:

Per my telephone conversation of today with your assistant Susan, kindly forward all of the materials concerning Ralph Barnett requested in Paul Robinson's February 21, 2006 correspondence as soon as possible. For your convenience, I am attaching a copy of the letter noting the materials we have requested.

Please contact our office should you have any questions regarding this matter.
Thank you.

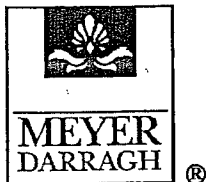
Very truly yours,

MATTHEW C. ASHBY
Paralegal to PAUL R. ROBINSON, ESQUIRE

MCA/hmt
Attachment

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
February 24, 2006
ALFA-107530
Page 2

bcc: John A. Culver, Esquire
bcc: Ms. Julie DeCraene
Claim No: YEB 12380 L
bcc: Ms. Katie Heim
bcc: Mr. Robert Walsh
bcc: Paul R. Robinson, Esquire



www.mdbbe.com

MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.

Attorneys-at-Law

U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

PAUL R. ROBINSON
ATTORNEY-AT-LAW

DIRECT DIAL: (412) 553-7146
E-MAIL: probinson@mdbbe.com

February 21, 2006

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
2815 Wilmington Road
New Castle, PA 16105

Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

Dear Mr. Hartman:

I am in receipt of plaintiff's expert report and curriculum vitae of Ralph Lipsey Barnett and am requesting the following information related to this report:

1. video tape of the human factors investigation of accidental foot switch activation noted under roman numeral 6 (page 7) of the report;
2. listing of the five (5) males and five (5) females names and addresses who took part in this investigation;
3. a complete copy of both Ralph Lipsey Barnett and Matthew J. Ulmenstine's files.

Additionally, although you have provided a curriculum vitae for Ralph Barnett, you have not provided a rate schedule or a listing of cases in which Mr. Barnett has testified as required by the Federal Rules of Civil Procedure. Please provide this information upon your receipt of this letter.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "P. Robinson".
PAUL R. ROBINSON

PRR/hmt

* * * Transmission Result Report (MemoryTX) (Mar. 3. 2006 1:54PM) * * *

1)
2)

Date/Time: Mar. 3. 2006 1:53PM

| File No. Mode | Destination | Pg(s) | Result | Page Not Sent |
|------------------|-----------------|-------|--------|------------------|
| 0410 Memory TX | #46917246528380 | P. 3 | OK | |

Reason for error

E. 1) Hang up or line fail
E. 3) No answer

E. 2) Busy

E. 4) No facsimile connection



www.mdbbe.com

MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.
 U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
 Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

Fax Transmission

To: Dallas W. Hartman, P.C. From: Matthew C. Ashby, Esquire
 Company: Dallas W. Hartman P.C. Date: March 3, 2006
 Fax #: 724-652-8380 Timekeeper #: 0047

You should receive 3 Page(s) including this cover page.
 If you do not receive all pages, please call 412-261-6600 at Ext. 7023 (CopyCenter)

Message:

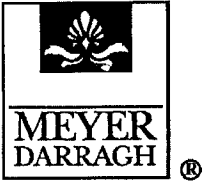
Re: Tina Lindquist v. Heim, L.P.
 Case No: 04-249E
 D/A: 9/25/02
 Our File: ALFA-107530

The information contained in this facsimile message is attorney privileged and confidential information intended only for the use of the individual or entity identified named above. If the reader is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via the U.S. Postal Service. We shall remit postage for the return of any such communications. Thank you.

MDB&E MATTER #: 107530

RECEIVER'S TELEPHONE #:

P0742854.1



MEYER ♦ DARRAGH
BUCKLER BEBENEK & ECK, P.L.L.C.
U.S. Steel Tower, Suite 4850 ♦ 600 Grant Street ♦ Pittsburgh, PA 15219
Phone: (412) 261-6600 ♦ Fax: (412) 471-2754

www.mdbbe.com

Fax Transmission

To: Dallas W. Hartman, P.C. From: Matthew C. Ashby, Esquire
Company: Dallas W. Hartman P.C. Date: March 3, 2006
Fax #: 724-652-8380 Timekeeper #: 0047

You should receive 3 Page(s) including this cover page.
If you do not receive all pages, please call 412-261-6600 at Ext. 7023 (CopyCenter)

Message:

Re: Tina Lindquist v. Heim, L.P.
Case No: 04-249E
D/A: 9/25/02
Our File: ALFA-107530

The information contained in this facsimile message is attorney privileged and confidential information intended only for the use of the individual or entity identified named above. If the reader is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via the U.S. Postal Service. We shall remit postage for the return of any such communications. Thank you.

MDBB&E MATTER #: 107530

RECEIVER'S TELEPHONE #: